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Roche Diagnostic Systems, Inc. Branchburg Township 1080 U.S. Highway 202 Somerville, New Jersey 08876-3771

Direct Dial Fax

510(k) Summary

Roche COBAS INTEGRA ISE Module Modification

In accordance with the Safe Medical Devices Act of 1990, a 510(k) summary as outlined in 21 CFR 807.92 is provided herewith.

L Identification of 510(k) Sponsor:

Roche Diagnostic Systems, Inc. a subsidiary of Hoffmann-La Roched, Inc. Branchburg Township 1080 US Highway 202 Somerville, NJ 08876-3771

510(k) Submission dated September 10, 1996

II. Description of the Device/Statement of Intended Use:

The COBAS INTEGRA test applications contained in this submission are intended for use with the COBAS INTEGRA Analyzer. The COBAS INTEGRA Analyzer and COBAS INTEGRA Reagent cassettes together provide an integrated system for *in vitro* diagnostic testing. The COBAS INTEGRA Analyzer along with 79 COBAS INTEGRA Reagent Cassettes were cleared on September 8, 1995 (K951595), January 25, 1996 (K954992) and July 23, 1996 (K961824). The COBAS INTEGRA Analyzer utilizes three measuring principles, i.e., absorbance, fluorescence polarization and ion-selective electrodes. The analyzer has a throughput of up to 600 tests per hour with STAT samples prioritized and tested immediately. Random sample access, robotics and a user interface optimize time management and streamline workflow. The COBAS INTEGRA can store up to 68 COBAS INTEGRA Reagent Cassettes on board, 24 hours a day at 2-8°C. The COBAS INTEGRA Reagent Cassettes are compact and preparation-free with

the added convenience of long term on-board stability. Barcode readers are used to identify newly loaded reagent cassettes, samples for patient identification, and rack inserts and to read calibration and control data from the cassette label. COBAS INTEGRA tests include chemistry, drugs of abuse, immunology, ion selective electrodes, therapeutic drug monitoring, and hematology reagents.

Through this submission, it is the intention of Roche Diagnostic Systems to gain clearance of a modified ISE Module which includes modified versions of the Direct Sodium, Direct Potassium, and Direct Chloride applications. These applications were previously cleared on September 8, 1995 (K951595). This premarket notification also includes new ISE applications for Direct Lithium, Indirect Sodium, Indirect Potassium, Indirect Chloride, Urine Sodium, Urine Potassium, and Urine Chloride.

The COBAS INTEGRA ISE module applications are intended for use for the quantitative determination of sodium, potassium, chloride, and lithium concentrations using ion-selective electrodes:

- the direct application is intended for undiluted serum and plasma
- the indirect application is intended for diluted serum and plasma (does not include lithium)
- the urine application is intended for diluted urine (does not include lithium)

III. Identification of the legally marketed device to which the 510(k) sponsor claims equivalence:

The COBAS INTEGRA ISE Module applications are substantially equivalent to the corresponding applications for the Boehringer Mannheim / Hitachi 911 analyzer or the Kodak Ectachem 250 analyzer.

The ancilliary reagents for the COBAS INTEGRA ISE Module were previously cleared in the original 510(k) for the ISE Module (K951595). However, ISE Solution 1 is now intended to be sold in two new packages with different names, "Calibrator Direct" and in a diluted form as "Calibrator Indirect/Urine". The new containers are larger and are stored on board the instrument, instead of using multiple vials of ISE Solution 1 in the ISE reagent rack.

The following table lists each ISE application and ancilliary reagents with the corresponding predicate device or previously cleared device name.

Table of Predicate Devices

Product Name	Predicate Product Name	K number	date of substantial equivalence
Roche COBAS INTEGRA ISE Module Tests:			
Direct Sodium	BM / Hitachi 911 Sodium (Indirect)	K912648	07/17/91
Direct Potassium	BM / Hitachi 911 Potassium (Indirect)	K912649	07/15/91
Direct Chloride	BM / Hitachi 911 Chloride (Indirect)	K912647	07/17/91
Direct Lithium	Kodak Ectachem Lithium	K924488	01/26/93
Indirect Sodium	BM / Hitachi 911 Sodium (Indirect)	K912648	07/17/91
Indirect Potassium	BM / Hitachi 911 Potassium (Indirect)	K912649	07/15/91
Indirect Chloride	BM / Hitachi 911 Chloride (Indirect)	K912647	07/17/91
Urine Sodium	BM / Hitachi 911 Sodium (Urine)	K912648	07/17/91
Urine Potassium	BM / Hitachi 911 (Urine)	K912649	07/15/91
Urine Chloride	BM / Hitachi 911 (Urine)	K912647	07/17/91
Roche COBAS INTEGRA ISE Module Ancillary Reagents	Previously approved Product Name	K Number	date of substantial equivalence
ISE Solution 1	ISE Solution 1	K951595	09/08/95
ISE Solution 2	ISE Solution 2	K951595	09/08/95
ISE Solution 3	ISE Solution 3	K951595	09/08/95
ISE Calibrator Direct	ISE Solution 1	K951595	09/08/95
ISE Calibrator Indirect / Urine	ISE Solution 1 (diluted)	K951595	09/08/95

IV. Summary of the technological characteristics of the new device in comparison to those of the predicate.

A summary of the similarities, differences and performance characteristics between the COBAS INTEGRA ISE Module applications and the corresponding Boehringer Mannheim / Hitachi 911 or Kodak Ectachem 250 applications are listed in the following tables.

Comparison Table - Direct Sodium

	COBAS INTEGRA Current ISE Direct Sodium Application	COBAS INTEGRA Modified ISE Direct Sodium Application	Boehringer Mannheim/Hitachi 911 Sodium
Intended Use	quantitative determination of sodium	quantitative determination of sodium	quantitative determination of sodium
Sample type	serum and plasma	serum and plasma	serum, plasma and urine
Methodology	Ion Selective Electrode - Direct	Ion Selective Electrode - Direct	Ion Selective Electrode - Indirect
Standards	ISE Sol'n 1: 150 mmol/L ISE Sol'n 2: 110 mmol/L	ISE Sol'n 1: 150 mmol/L ISE Sol'n 2: 110 mmol/L	STD 1: 120.0 mmol/L STD 2: 160.0 mmol/L
Performance Cl		100 050	Loo. 400
Test Range	20 - 250 mmol/L	20 - 250 mmol/L	80 - 180 mmol/L
Precision:	Level 1 Level 2	Level 1 Level 2	Level 1 Level 2 Level 3
Mean (mmol/L)	135.7 153.7	116 146	128.9 137.5 148.5
%CV (within run)	0.40 0.17	0.32 0.25	0.3 0.2 0.2
%CV (total)	1.1 1.6	1.0 0.69	0.5 0.4 0.6
Accuracy	y= 1.06x - 5.1 mmol/L r= 0.998 n=100	y= 0.99x + 5.3 mmol/L r= 0.989 n= 208	y= 1.018x - 2.35 mmol/L r= 0.999
	vs. BM / Hitachi 911	vs. BM / Hitachi 911	vs. flame photometry

Comparison Table - Direct Potassium

	COBAS INTEGRA Current ISE Direct Potassium Application	COBAS INTEGRA Modified ISE Direct Potassium Application	Boehringer Mannheim/Hitachi 911 Potassium
Intended Use	quantitative determination of potassium	quantitative determination of potassium	quantitative determination of potassium
Sample type	serum and plasma	serum and plasma	serum and plasma
Methodology	Ion Selective Electrode - Direct	lon Selective Electrode - Direct	Ion Selective Electrode - Indirect
Standards	ISE Sol'n 1: 5 mmol/L ISE Sol'n 2: 1.8 mmol/L	ISE Sol'n 1: 5 mmol/L ISE Sol'n 2: 1.8 mmol/L	STD 1: 3.00 mmol/L STD 2: 7.00 mmol/L
Performance CI	naracteristics:		
Test Range	0.2 - 30 mmol/L	0.2 - 30 mmol/L	1.5 - 10.0 mmol/L
Precision: Mean (mmol/L)	Level 1 Level 2 3.18 7.25	Level 1 Level 2 4.3 7.2	Level 1 Level 2 Level 3 3.41 5.69 6.40
%CV (within run) %CV (total)	0.30 0.42 1.5 1.8	0.24 0.29 0.75 0.89	0.3
Accuracy	y= 1.07x - 0.22 mmol/L r= 0.999 n=100 vs. BM / Hitachi 911	y= 1.03x + 0.02 mmol/L r= 0.998 n= 208 vs. BM / Hitachi 911	y= 1.041x - 0.177 mmol/L r= 0.999 n= 52 vs. flame photometry

Comparison Table - Direct Chloride

	COBAS INTEGRA Current ISE Direct Chloride Application	COBAS INTEGRA Modified ISE Direct Chloride Application	Boehringer Mannheim/Hitachi 911 Chloride
Intended Use	quantitative determination of chloride	quantitative determination of chloride	quantitative determination of chloride
Sample type	serum and plasma	serum and plasma	serum, and urine
Methodology	Ion Selective Electrode - Direct	Ion Selective Electrode - Direct	Ion Selective Electrode - Indirect
Standards	ISE Sol'n 1: 115 mmol/L ISE Sol'n 2: 72 mmol/L	ISE Sol'n 1: 115 mmol/L ISE Sol'n 2: 72 mmol/L	STD 1: 80.0 mmol/L STD 2: 120.0 mmol/L
Performance C			-
Test Range	20 - 250 mmol/L	20 - 250 mmol/L	60 - 140 mmol/L
Precision: Mean (mmol/L) %CV (within run) %CV (total)	Level 1 Level 2 135.7 153.7 0.40 0.17 1.1 1.6	Level 1 Level 2 92 106 0.39 0.37 1.3 0.85	Level 1 Level 2 Level 3 89.2 102.2 113.7 0.4 0.3 0.3 0.7 0.5 0.8
Accuracy	y= 1.19x - 17.9 mmol/L r= 0.996	y= 0.91x + 12.8 mmol/L r= 0.969 n= 208 vs. BM / Hitachi 911	y= 1.073x - 8.80 mmol/L r= 0.999 n= 42 vs. chloridometer

Comparison Table - Direct Lithium

	COBAS INTEGRA ISE Direct Lithium Application	Kodak Ectachem Lithium
Intended Use	quantitative determination of lithium	quantitative determination of lithium
Sample type	serum and plasma	serum and plasma
Methodology	Ion Selective Electrode - Direct	Colorimetric
Standards	ISE Sol'n 1: 0.3 mmol/L	information not available
	ISE Sol'n 2: 0.3 mmol/L	
	ISE Sol'n 3: 1.4 mmol/L	
Performance C		Lo 00 4 00
Test Range	0.1 - 4 mmol/L	0.20 - 4.00 mmol/L
Precision:	Level 1 Level 2	Level 1 Level 2 Level 3 Level 4
Mean (mmol/L)	0.44 1.9	0.47 0.96 1.17 2.14
%CV (total)	3.4 2.9	6.93 4.76 3.86 3.12
Accuracy	y= 0.98x - 0.10 mmol/L	y= 1.00x - 0.03 mmol/L
	r= 0.964 n= 244	r= 0.991 n= 200
	vs. Kodak Ectachem	vs. ion-selective electrode

Comparison Table - Indirect Sodium

	COBAS INTEGRA Modified ISE Indirect Sodium Application	Boehringer Mannheim/Hitachi 911 Sodium
Intended Use	quantitative determination of sodium	quantitative determination of sodium
Sample type	serum and plasma	serum, plasma and urine
Methodology	Ion Selective Electrode - Indirect	Ion Selective Electrode - Indirect
Standards	ISE Sol'n 1: 150 mmol/L ISE Sol'n 2: 110 mmol/L	STD 1: 120.0 mmol/L STD 2: 160.0 mmol/L
Performance C		
Test Range	20 - 250 mmol/L	80 - 180 mmol/L
Precision:	Level 1 Level 2	Level 1 Level 2 Level 3
Mean (mmol/L)	112 138	128.9 137.5 148.5
%CV (within run)	0.26 0.24	0.3 0.2 0.2
%CV (total)	1.0 0.59	0.5 0.4 0.6
Accuracy	y= 0.96x - 1.2 mmol/L	y= 1.018x - 2.35 mmol/L
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	r= 0.994 n= 208	r= 0.999 n= 45

Comparison Table - Indirect Potassium

	COBAS INTEGRA ISE Indirect Potassium Application	Boehringer Mannheim/Hitachi 911 Potassium
Intended Use	quantitative determination of potassium	quantitative determination of potassium
Sample type	serum and plasma	serum, plasma and urine
Methodology	Ion Selective Electrode - Indirect	Ion Selective Electrode - Indirect
Standards	ISE Sol'n 1: 5 mmol/L ISE Sol'n 2: 1.8 mmol/L	STD 1: 3.00 mmol/L STD 2: 7.00 mmol/L
Performance Ch	naracteristics:	1.5 - 10.0 mmol/L
		
Precision: Mean (mmol/L) %CV (within run) %CV (total)	Level 1 Level 2 4.3 6.9 0.44 0.31 0.75 0.83	Level 1 Level 2 Level 3 3.41 5.69 6.40 0.3 0.2 0.3 0.7 0.5 0.7
Accuracy	y= 1.00x - 0.09 mmol/L r= 0.999	y= 1.041x - 0.177 mmol/L r= 0.999 n= 52 vs. flame photometry

Comparison Table - Indirect Chloride

	COBAS INTEGRA ISE Indirect Chloride Application	Boehringer Mannheim/Hitachi 911 Chloride
Intended Use	quantitative determination of chloride	quantitative determination of chloride
Sample type	serum and plasma	serum, plasma and urine
Methodology	Ion Selective Electrode - Indirect	Ion Selective Electrode - Indirect
Standards	ISE Sol'n 1: 115 mmol/L	STD 1: 80.0 mmol/L
	ISE Sol'n 2: 72 mmol/L	STD 2: 120.0 mmol/L
Performance C	haracteristics:	
		60 - 140 mmol/L
Test Range	20 - 250 mmol/L	60 - 140 mmol/L Level 1 Level 2 Level 3
Test Range Precision:	20 - 250 mmol/L	
Test Range Precision: Mean (mmol/L)	20 - 250 mmol/L Level 1 Level 2	Level 1 Level 2 Level 3
Test Range Precision: Mean (mmol/L) %CV (within run)	20 - 250 mmol/L Level 1 Level 2 92 107	Level 1 Level 2 Level 3 89.2 102.2 113.7
Test Range Precision: Mean (mmol/L)	20 - 250 mmol/L Level 1 Level 2 92 107 0.36 0.26	Level 1 Level 2 Level 3 89.2 102.2 113.7 0.4 0.3 0.3
Test Range Precision: Mean (mmol/L) %CV (within run) %CV (total)	20 - 250 mmol/L Level 1 Level 2 92 107 0.36 0.26 1.1 0.83	Level 1 Level 2 Level 3 89.2 102.2 113.7 0.4 0.3 0.3 0.7 0.5 0.8

Comparison Table - Urine Sodium

	COBAS INTEGRA ISE Urine Sodium Application	Boehringer Mannheim/Hitachi 911 Sodium
Intended Use	quantitative determination of sodium	quantitative determination of sodium
Sample type	urine	serum, plasma and urine
Methodology	Ion Selective Electrode - Indirect	Ion Selective Electrode - Indirect
Standards	ISE Sol'n 1: 150 mmol/L ISE Sol'n 2: 110 mmol/L	STD 1: 120.0 mmol/L STD 2: 160.0 mmol/L
Performance C	haracteristics:	10 - 250 mmol/L
Precision:	Level 1 Level 2	Level 1 Level 2 Level 3
Mean (mmol/L)	56 259	58.3 107.2 177.4
%CV (within run)	1.0 0.49	0.4 0.3 0.3
%CV (total)	3.0 1.2	1.0 0.6 0.6
Accuracy	y= 0.95x + 3.4 mmol/L r= 0.996 n= 174 vs. BM / Hitachi 911	y= 0.963x + 3.06 r= 1.000 n= 49 vs. flame photometry

Comparison Table - Urine Potassium

	COBAS INTEGRA ISE Urine Potassium Application	Boehringer Mannheim/Hitach 911 Potassium
Intended Use	quantitative determination of potassium	quantitative determination of potassium
Sample type	urine	serum, plasma and urine
Methodology	Ion Selective Electrode - Indirect	Ion Selective Electrode - Indirect
Standards	ISE Sol'n 1: 5 mmol/L ISE Sol'n 2: 1.8 mmol/L	STD 1: 3.00 mmol/L STD 2: 7.00 mmol/L
Performance C	naiavieristies.	
Test Range	1 - 150 mmol/L	1.5 - 80 mmol/L
Test Range Precision:	1 - 150 mmol/L Level 1 Level 2	1.5 - 80 mmol/L Level 1 Level 2 Level 3
Precision:	Level 1 Level 2	Level 1 Level 2 Level 3
Precision: Mean (mmol/L)	Level 1 Level 2 33 125	Level 1 Level 2 Level 3 22.9 44.1 69.5

Comparison Table - Urine Chloride

	COBAS INTEGRA ISE Urine Chloride Application	Boehringer Mannheim/Hitachi 911 Chloride
Intended Use	quantitative determination of chloride	quantitative determination of chloride
Sample type	urine	serum, plasma and urine
Methodology	Ion Selective Electrode - Indirect	Ion Selective Electrode - Indirect
Standards	ISE Sol'n 1: 115 mmol/L	STD 1: 80.0 mmol/L
	ISE Sol'n 2: 72 mmol/L	STD 2: 120.0 mmol/L
Test Range	20 - 350 mmol/L	1.5 - 80 mmol/L
Test Range Precision:	20 - 350 mmol/L Level 1 Level 2	1.5 - 80 mmol/L Level 1 Level 2 Level 3
Precision:		
	Level 1 Level 2	Level 1 Level 2 Level 3
Precision: Mean (mmol/L)	Level 1 Level 2 147 274	Level 1 Level 2 Level 3 50.3 122.5 202.0
Precision: Mean (mmol/L) %CV (within run)	Level 1 Level 2 147 274 0.44 0.30	Level 1 Level 2 Level 3 50.3 122.5 202.0 0.7 0.7 0.6
Precision: Mean (mmol/L) %CV (within run) %CV (total)	Level 1 Level 2 147 274 0.44 0.30 1.1 2.1	Level 1 Level 2 Level 3 50.3 122.5 202.0 0.7 0.7 0.6 1.6 0.9 1.2

V. Breif discussion of the clinical and nonclinical tests relied on for a determination of substantial equivalence:

To demonstrate equivalence in performance characteristics, the COBAS INTEGRA ISE Module applications were tested for precision and accuracy. See tables in previous section for results.

Precision Study

Precision was evaluated using two levels of controls following the guidelines from NCCLS EP5-T2.

Correlation Study

Correlation studies were done comparing the Sodium, Potassium, Chloride, and Lithium applications with the corresponding applications on the Boehringer Mannheim / Hitachi 911 analyzer and Lithium with the Kodak Ectachem 250 application. Greater than 200 specimens were tested on both systems for each application. The results were evaluated using linear regression analysis.